

## CONOVER

LAW OFFICES  
345 Seventh Avenue, 21st Floor  
New York, NY 10001

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Telephone (212) 588-9080  
Telecopier (212) 588--9082

Molly Smithsimon\*

\*Direct email: molly@conoverlaw.com

April 21, 2015

### VIA ECF

Hon. Ronnie Abrams  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 620  
New York, NY 10007

Re: *Ludizaca et al v. GFB Restaurant Corp. et al.*  
Case No. 13-cv-9180(RA)(MHD)

Dear Judge Abrams:

The parties participated in a settlement conference before Judge Dolinger on March 31, 2015. At the conference, the parties were not able to reach agreement on settlement, however defendants agreed to produce financial disclosure in furtherance of ongoing settlement negotiations. Defendants provided several documents on April 8, one additional document today, and have indicated they may provide several additional documents shortly.

In light of the continued settlement negotiations concerning the named and opt-in plaintiffs, the parties respectfully request a two-week extension of the deadline for the plaintiffs to file their motion for certification of a Rule 23 class from April 24, 2015 to May 8, 2015. Defendants consent to this request. The additional time will enable the parties to engage in substantive negotiations. We hope to reach a mutually acceptable settlement agreement in the near term.

Thank you for your consideration.

Respectfully submitted,  
/s  
Molly Smithsimon  
Counsel for Plaintiffs